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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ESTHER KIM
CHANG IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S OPPOSITION TO
WAYMO'S MOTION TO COMPEL
STROZ-RELATED DISCOVERY**

Trial Date: December 4, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and
6 Ottomotto LLC's Opposition to Waymo LLC's Motion to Compel Stroz-Related Discovery.

7 2. As of August 24, 2017, Waymo had inspected Uber's facilities, business records,
8 and devices pursuant to the Court's May 11, 2017 provisional relief order for more than 60 hours.

9 3. Specifically, Waymo inspected Uber's facilities, LiDAR devices, schematics,
10 source code, Computer-Aided Design files, and engineers' computers.

11 4. Waymo inspected hundreds of thousands of LiDAR-related documents and emails,
12 including emails of 60 current and former Uber personnel with LiDAR-related responsibilities or
13 projects.

14 5. Waymo specifically requested inspection of the Uber-issued computers and phones
15 assigned to engineers Anthony Levandowski, Daniel Gruver, James Haslim, Max Levandowski,
16 Asheem Linaval, Gaetan Pennecot, and William Treichler, and those engineers' devices were
17 made available for inspection.

18 6. As to Anthony Levandowski, Waymo inspected his Uber-issued iPhone and work
19 station on June 6, 2017, inspected his Uber-issued laptop on June 12, and inspected a partial
20 backup of another computer he had used on June 28.

21 I declare under penalty of perjury that the foregoing is true and correct. Executed this
22 17th day of October, 2017 at San Francisco, California.

23
24 /s/ Esther Kim Chang
ESTHER KIM CHANG

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Esther Kim Chang has concurred in this filing.

Dated: October 17, 2017

/s/ Arturo J. González
Arturo J. González